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20th September 2018

Dear Mr Dakeyne

**Re: Staffordshire Moorlands Local Plan Examination.  
MATTERS, ISSUES AND QUESTIONS (MIQ) FOR THE EXAMINATION AND HEARING  
SESSIONS**

I write in connection with the above and especially with reference matter 2 (strategy) and matter 4 (tourism).

Yours Sincerely

Gerald Willard

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## Matter 2 (strategy)

### 3.7 Is the policy too restrictive?

There is no national policy that restrict all but 'essential' development in the countryside and this draft local plan policy ought not go beyond national planning policy. Moreover such a restriction is wholly at odds with the policy aim under 2 of policy SS10 to sustain the rural economy.

The council's own pen portrait in the plan says this:

*3.1 Staffordshire Moorlands is in north east Staffordshire, bordered by Cheshire to the north-west, Derbyshire to the east and Stoke-on-Trent to the south-west. The district covers an area of 57,624 hectares and has a population of 97,106 (2011 Census). Around 54% of the population is based in the three towns of Leek, Bidulph and Cheadle; around 22% of the population lives in the larger settlements of Cheddleton, Endon, Werrington & Cellarhead and Blythe Bridge, located in the west of the district. The remainder are divided among 34 rural parishes.*

and it says this;

*3.19 Community life is a strong and distinctive feature of Staffordshire Moorlands. People identify closely with their towns, neighbourhoods and villages. Pride in local communities is high, leading to a rich pattern of community activities and organisations. Local parish councils, voluntary and community groups play a vital part in maintaining this special characteristic of the district.*

Is clear then that some 24% of the population lives in the smaller villages and settlements and that the districts has a strong community spirit. This being the case the rural parts of the district need positive policy support not a standardised policy mantra.

What is required is a policy in respect of rural areas that is positive both in protecting the visual quality and integrity of the place whilst at the same time positive enough to

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support changes and organic growth where it occurs. Care must be given to adopt policy which is a future proof as can be foreseen.

In recent years there has been a marked reduction in rural service provision across all services and this seems set to continue. New development where it is modest and proportionate can help to sustain existing services and support new ones. In the areas of home working and small scale business starts ups who employ local people these can bring much needed jobs and expenditure into the rural area whether in existing buildings, extensions or occasionally in new buildings. The Government policy (Class Q) of promoting the conversion of even modern farm buildings is ample evidence of Governments understanding that rural areas need limited new development to help keep communities alive.

Staffordshire Moorlands has a thriving tourism industry based mainly on the UK's number 1 single destination Alton Towers attraction. There is a need to extend the reach of this economic benefit to areas within the Churnet Valley and beyond. The UK 'staycation' market is growing and this has considerable benefits. Firstly it limits both greenhouse gas emissions as less people need or wish to fly for their holidays and finance is lost abroad. Staying in the UK even on short stays can therefore both play a part in reducing greenhouses gases whilst at the same time boosting the rural economy.

It is a clear fact too that tourists seeking to visit Staffordshire Moorlands are to be enticed to see the countryside. There is no planing sense or gain in pretending people will wish to stay in towns or even the larger villages as they will be arriving by car (as their luggage demands and woeful bus service dictate) and need the same car to see the Countryside they have come to visit. It is folly to think or plan otherwise.

This being the case it is rather better to devise policy that seeks to encourage walking, cycling, car sharing and car charing across the district so that the same car driving visitors can be 'nudged' towards making more sustainable tourism choices once within the district.

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A failure to support new tourism ventures 'in principle' if they are not in or on the edge of a town will not encourage people to find tourism provision within a town or village within the District. It is instead more likely to result in that same tourist choosing to visit another part of the UK at best or at worst jumping on a plane. Moreover even if such a tourist were to look to a town or village location would the council really wish to be promoting the growth of room and space rent at the cost of residential use. There are plenty of stories 'on-line' as to the damage Airbnb is causing to home prices and availability in some parts of the world. It is not the kind of thing that this district would wish to inadvertently support.

*Suggested changes.*

*Remove the essential need test and replace it with a policy which is supportive of*

- *New business ventures in the rural which are small in scale (under 4 staff say) and which can be undertaken without material harm to the landscape they lie within and which can demonstrate their sustainable benefits by virtue of sustainable and energy efficient design.*
- *New tourism ventures across the district where show protection or enhancement of the landscape and demonstrate their resource and energy efficient design and sustainable use of resources.*

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## **Matter 4 (tourism)**

In addition to the above which applies equally into the criticism of policy E4 the following comments are relevant.

The policy is out of step with the recent NPPF. Whilst the inquiry is to proceed on the basis of the 2012 NPPF in respect of main strategy this makes no sense in respect of policies such as this and where the 2018 NPPF is markedly different to both the 2012 NPPF and the draft policies. In respect of tourism the 2018 NPPF is more in tune with recent of Government policy and sectoral changes in that it seeks broadly to promote modest levels tourism including that which lies beyond town or settlements.

The 2018 NPPF says:

*84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*

The positive and realistic tone of the NPPF in respect of this matter is clear and self evident.

### ***Suggested changes***

*Draft policy is revised so as to be more positive in respect of tourism and business developments across the rural area and to accord with the 2018 NPPF.*

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